

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-60117-CR-LEIBOWITZ

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANJAY SINGH,

Defendant.

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DEFENDANT'S EXHIBIT LIST

PRESIDING JUDGE Hon. David S. Leibowitz					ASSISTANT UNITED STATES ATTORNEY Robert Moore/Roger Cruz	DEFENDANT'S ATTORNEY Abigail Becker/Victor Van Dyke
TRIAL DATE October 7, 2024					COURT REPORTER	COURTROOM DEPUTY Tamisha Shotwell
PLF. NO.	EX. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS	
	A-1				USDOT FMCSA Safety Investigation August 2021	
	A-2				USDOT FMCSA Safety Investigation February 2023	
	A-3				USDOT FMCSA Vehicle/Equipment List	
	A-4				RBL upgrade request to FMCSA 9/27/21	
	A-5				FMCSA upgrade to conditional 10/15/21	
	B-1				Makin Capital file 9/9/22	
	B-2				Makin Capital file 3/14/23	
	B-3				Rand Short Term Loan Agreement 12/1/22	
	B-4				Rand Short Term Loan Agreement 1/11/23	
	B-5				GoMotive fba Keep Truckin Invoices	
	B-6				GoMotive fba Keep Truckin Invoices 2	
	B-7				GoMotive Daily Log Jorge Santos	
	B-8				traffic crash file	
	B-9				Rand driver counseling form 8-15-22	
	B-10				Fleet Policy and Procedure Manual 10-15-21	
	B-11				Fleet Safety Policies and Procedures Manual	
	B-12				Safety Management Plan	
	B-13				Motive invoice for ELDs and service 10/19/22	
	B-14				Request to upgrade FMCSA rating	
	B-15				GoMotive invoice 8-30-22	

	B-16				GoMotive invoice 5-20-22
	B-17				Rand email process to approve repairs 11-16-22
	B-22				Rand email re driver-employee discipline 9-8-22
	B-38				Rand email of resignation 2-8-23
	C-1				Fleet Safety Policies & Procedures Manual
	C-2				Internal Hours of Service Procedures 10-14-21
	C-3				LeClair email re MVR Monitoring with JJ Keller 8-13-21
	C-4				LeClair email re enrolling in health ins
	C-5				email re fleet management
	D-1				Email between Kara Cooper and Laine D'Orvilliers 3-23-22
	D-2				Kara Cooper Certificate of Liability Insurance Axle
	D-3				Kara Cooper Certificate of Insurance Prime
	D-4				Kara Cooper Truck Invoice
	D-5				Cooper Convoy Articles of Organization
	E-1				Diesel Diagnostics Records
	F-1				RBL All Tests 7-1-21 - 12-31-21
	F-2				RBL All Tests 1-1-22 - 6-30-22
	F-3				RBL all Tests 7-1-22 - 12-31-22
	F-4				USDOT Drug and Alcohol Annual Report 2022
	F-5				1Q23 Random Urine Drug Test Selections
	F-6				Certificate of Enrollment in Drug and Alcohol Program RBL
	F-7				RBL INVOICE DETAIL 2018-2023
	F-8				RBL LIST OF DRUG TESTS BY DRIVER 2018-2023
	G-1				Tenstreet invoices
	G-2				Tenstreet Master Services Agreement
	G-3				UnitedHealthCare Group Policy 9-15-21
	G-4				UnitedHealthCare Group Policy 9-1-22
	G-5				UnitedHealthCare Record of Payment
	G-15				Perkins email re Timeclock App use
	G-16				Email circulating Fleet Safety Policy and Procedures Manual
	G-22				RBL Benefits Enrollment Form
	G-25				RBL Web Application User Guide
	G-26				10.17.2021 Weekly Settlement for Kiari Singleton
	G-41				RBL Meeting Minutes for 7.5.2022 Compliance Weekly Meeting
	G-42				Email circulating Alcohol and Drug Policy 8.19.2022
	G-43				RBL Drug and Alcohol Policy
	G-45				06.14.2022 Performance Deficiencies and Improvement Plan Memo
	H-1				email Karen Wolsey to Manohar requesting credit app
	H-2				YC Credit application
	H-3				email Manohar to Wolsey w completed credit app
	H-4				Manohar completed credit app
	H-5				Manohar 6-15-23 email with credit app and supporting docs

	H-6				Manohar 6-15-23 credit app
	I-1				email w pics of Costello reefer trailer
	I-2				invoice Costello reefer
	I-3				email w pics of Costello's 2nd truck
	I-4				Costello email re adding 2nd truck for wife
	I-5				Costello email re toll violation
	I-6				Costello toll violation
	I-7				Costello email re RE investment
	I-8				email re Costello truck totaled
	I-9				Costello email re RBL working w insurance re totaled truck
	I-10				email re cooling off period
	I-21				Singh email re letting 2 nd one finalize before 4 th investment
	J-1				draft term sheet RBL and Big Charter
	J-2				web application userguide v1.0
	J-3				photo trailer manufacturing
	J-4				photo trailer manufacturing 2
	J-5				photo trailer manufacturing 3
	J-6				FLY BIG ACCOUNTS MAY-JUNE
	J-7				Binding Term Sheet
	J-8				Engagement letter 1-1-21
	J-9				BL 5-28-21 Invoice
	J-10				BL 7-7-21 Invoice
	J-11				BL 10-26-21 Invoice
	J-12				BL 11-26-21 Invoice
	J-13				BL 1-10-22 Invoice
	J-14				BL 4-4-22 Invoice
	J-15				BL 4-4-22 Invoice
	J-16				BL 7-14-22 Invoice
	J-17				BL 2-10-21 Invoice
	J-18				BL 2-22-21 Invoice
	J-19				BL 3-31-21 Invoice
	J-20				BL 4-30-21 Invoice
	J-21				BL 5-31-21 Invoice
	J-22				BL 6-30-21 Invoice
	J-23				BL 7-31-21 Invoice
	J-24				BL 8-31-21 Invoice
	J-25				BL 9-30-21 Invoice
	J-26				BL Employee Payroll
	J-27				BL Touchmedia Invoice 7-3-23
	J-28				RBL Driver App User Guide
	J-29				BL RBL engagement letter 9-1-21
	J-30				BL Touchmedia Invoice 1-5-23

J-31				BL Touchmedia Invoice 3-1-23
J-32				BL Touchmedia Invoice 4-2-23
J-33				BL Touchmedia Invoice 11-3-22
J-34				BL 4-1-22 Invoice
J-35				BL 8-15-22 Invoice
J-36				BL 7-10-22 Invoice
J-37				BL 6-25-22 Invoice
J-38				BL 9-15-22 Invoice
J-39				BL 2-26-22 Invoice
J-40				BL 3-13-22 Invoice
J-41				BL 3-26-22 Invoice
J-42				BL 8-25-22 Invoice
J-43				BL 7-20-22 Invoice
J-44				BL 9-27-22 Invoice
J-45				BL 4-14-22 Invoice
J-46				BL 11-28-22 Invoice
J-47				BL 12-26-22 Invoice
J-48				BL 1-26-23 Invoice
J-49				BL 2-26-23 Invoice
J-50				BL 4-17-23 Invoice
J-51				BL 4-26-23 Invoice
J-52				BL 5-30-23 Invoice
J-53				BL 3-27-23 Invoice
J-54				RBL Web Application User Guide 10-2-21
J-55				BL Touchmedia Invoice 1-5-23
J-56				EXPENSE SHEET 2022 - 2023
J-57				Chavan email re payment request 9-28-22
J-58				Chavan email re payment request 9-7-22
J-59				BL BOL for trailers
J-60				BL Invoice for trailer shipment
J-61				BL Invoice for trailer shipment 2
J-62				BL tax invoice for trailer shipment
J-63				M/S Black Lion Translink
J-64				BL Brown Bull Logistics
J-65				Reliance General Ins re shipment
J-66				RBL Payment for dry trailer
J-67				trailer photo
J-68				trailer photo 2
J-69				trailer photo 3
J-70				BL 1-26-23 Invoice
J-71				BL 7-7-21 Invoice
J-72				BL 11-26-21 Invoice

J-73	Chavan email weekly deposit to BL 5-5-23
J-74	Chavan email re shipping bill 8-25-22
J-75	Chavan email w BL balance sheet 8-29-22
J-76	BL balance sheet
J-77	Chavan email w engagement letter 9-3-22
J-78	Chavan email w shipping bill invoice 9-8-22
J-79	Brown Bull invoice 9-8-22
J-80	BL Touchmedia Invoice 1-2-23
J-81	BL 10-3022 Invoice
J-82	Chavan email re FLYBIG May Data
J-83	FLYBIG May Data
J-84	email re BigCharter Term Sheet 6-3-23
J-85	BL Touchmedia Invoice 2-4-23
J-86	Big Charter MOU 5-2-23
J-87	Chavan email re RBL application 10-13-21
K-1	New Driver Training Materials
L-1	ADP Materials
L-2	ADP Materials 2
L-3	ADP Materials 3
L-4	Mulkey email re offering health ins
L-5	Employee Medical Benefits Open Enrollment Guide
L-6	employment offer letter to mechanic Zachary Rimer
L-10	Mulkey email re trucks waiting for pickup
L-15	Mulkey Indeed candidate email
L-23	Mulkey Indeed application email
L-28	Letus LLC Week Settlement 16
L-40	Truck Spreadsheet
L-51	Mulkey Affidavit
M-1	New Asset Acquisition Checklist
N-1	Rashtrawar credit application
O-1	Fw_RBL Investment Update
P-1	load tracker
P-2	load spreadsheet
Q-1	Truck and Trailer Inspection Checklist
Q-2	Gutierrez email re repair approval 4-23-21
Q-3	S Singh email re uploading BOLs 5-21-19
Q-4	R Gutierrez CV
Q-5	S Singh email naming R Gutierrez Director Ops 7-31-19
Q-6	truck inspection form
R-1	Hueber email re draft lease TX dealership 4-21-23
R-2	Provost draft lease TX dealership
S-1	truck spreadsheet

	S-2				JJ Keller contract for MVR monitoring service
	S-3				payment receipt for monthly JJ Keller services
	S-4				Prime Insurance
	S-5				Wex Purchase Summary 1-1-21 - 9-30-22
	S-6				Axle insurance phys damage policy
	S-7				AMEX 2022 year end statement
	S-8				GoMotive 5-20-22 invoice
	S-33				Heuber Email re QuickBooks credential
	S-34				Riya Corporate Acquisition Agreement
	S-35				Black Lion Trailer Engagement Letter
	Z-4				Several mechanics in front of hangar
	Z-5				Side view of trailer in hangar
	Z-6				Side view of trailer in hangar #2
	Z-7				Back view of trailer doors
	Z-8				Trailer manufacturing with side panels
	Z-9				Several trucks parked inside hangar
	Z-10				Trailer panels being installed
	Z-11				Tanks filled with tires for load testing
	Z-12				Hangar entrance photo
	Z-14				Trucks parked inside hangar
	AA-1				Bellony Google chat
	AC-3				Provost Email with Deal Sheet for Lubbock Property
	AC-6				Deal Sheet for Lease of Building 82
	AC-33				NAA Sunbiz Article of Incorporation

Respectfully submitted,

HECTOR DOPICO
FEDERAL PUBLIC DEFENDER

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CERTIFICATE OF SERVICE

I HEREBY certify that on November 3, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Abigail Becker